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February 20, 2008

Mr. Michael Berkoff  
Remedial Project Manager  
U.S. Environmental Protection Agency-Region 5  
77 W. Jackson Blvd. SR-6J  
Chicago, IL 60604

Subject: 12<sup>th</sup> Street Landfill (Operable Unit #4 of the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site), Otsego Township, Michigan  
Draft Remedial Design Work Plan

Dear Michael:

In accordance with Section IX, Paragraph 28, of the Consent Decree for the Design and Implementation of Certain Response Actions at Operable Unit #4 and the Plainwell Inc., Mill Property of the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site (Consent Decree) and Section III, Task 1, of the Statement of Work, Weyerhaeuser Company is submitting three copies of the draft Remedial Design Work Plan for the 12<sup>th</sup> Street Landfill (Operable Unit #4)<sup>(1)</sup>. This document contains the required components for the Remedial Design Work Plan, including a summary of the existing environmental information for the landfill, a description of the Emergency Action activities that were implemented at the 12<sup>th</sup> Street Landfill in 2007 that fulfilled certain components of the remedy, a Health and Safety Plan for the proposed pre-design field investigations, and revisions to the Multi-Area Quality Assurance Project Plan (QAPP) and the Multi-Area Field Sampling Plan (FSP) to support the pre-design field investigations.

To simplify your review of the Multi-Area QAPP, we have reproduced this document to focus your attention on sections of text and worksheets that were not part of previously approved versions. Revisions to the main text are highlighted in yellow, as are revisions to previous approved worksheets. For new worksheets, we simply highlighted the title. A summary of all the worksheets, including the date of the last revision, is provided in the table of contents (the new/revised worksheets with this submittal are highlighted in yellow). As an added visual aid, we copied the worksheet pages that have no changes on blue paper.

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<sup>(1)</sup> Pursuant to the project conference call on January 9, 2008, the U.S. EPA agreed that the timeline for developing the Remedial Design Workplan started on January 7, 2008, and that the Health and Safety Plan for the pre-design field investigations could be submitted as part of the Remedial Design Workplan.

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As we discussed with the U.S. EPA and the MDEQ during our meeting on December 7, 2007, Weyerhaeuser is proposing to expedite the schedule for the Remedial Design by streamlining the design submittals. This will allow the landfill cover and other remedial action activities to be constructed in 2009, which is a year sooner than would have been the case following the Remedial Design process outlined in Paragraph 28 of the Consent Decree. In addition to having submitted this document in less time than allowed under the Consent Decree (45 days instead of 60 days), Weyerhaeuser is proposing to submit a draft Design Report for review by the agencies that will include all the components of the pre-final Design Report, and to address the agencies' comments in the final Design Report (details are described in Section 6 of the Work Plan). To this end, we would appreciate receiving your comments on this draft Remedial Design Work Plan on or before March 24, 2008. Weyerhaeuser and RMT representatives would be amenable to meeting with you, at your convenience, to discuss your comments.

Please contact me, at (253) 924-3746, if you have any questions.

Sincerely,

  
Jennifer Hale  
Environmental Manager  
Weyerhaeuser Company

cc: Eileen Furey – U.S. EPA, ORC (cover letter only)  
Paul Bucholtz – MDEQ (2 copies)  
Marty Lebo – Weyerhaeuser Company  
John Gross – Weyerhaeuser Company  
Joe Jackowski – Weyerhaeuser Company (cover letter only)  
Mark Schneider – Perkins Coie (cover letter only)  
Linda Hicken – RMT, Inc.  
Kathy Huibregtse – RMT, Inc.